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SANTOS RENE SOTO

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

SANTOS RENE SOTO and SANTOS
MOISES SOTO, III,

Defendants.

Case No.: CR 22-0378 WHO

**JOINT STATUS REPORT AND STIPULATION TO
CONTINUE FEBRUARY 6, 2025 STATUS
CONFERENCE AND [PROPOSED] ORDER**

Plaintiff United States of America, through undersigned counsel, and defendants Santos Rene Soto and Santos Moises Soto, III, through undersigned counsel, provide the following status report to update the Court on the parties' efforts and discussions on various outstanding issues. The parties also request that the February 6, 2025 status conference be continued approximately one month to March 13, 2025, or as soon thereafter may be heard, and that time be excluded for effective preparation of counsel.

Since the last Status Conference, the parties have continued to confer about the remaining discovery issues, and the government has produced electronic copies of paper documents and materials

1 seized during the search of 729 Douglass Street. The last batch of these materials, consisting of scans of
2 notebooks, journals, and other bound materials and certain loose paper documents, was produced by the
3 government on January 24, 2025.

4 Both defense counsel are in trial in the month of February. Counsel for Santos Rene Soto begins
5 trial on February 7, 2025, in *USA v. Robert Davis*, CR 23-0231 AMO. Counsel for Santos Moises Soto
6 III, is currently in trial in *USA v. Onofre Salas-Lozano*, CR 23-0101 EJD. Continuing the status
7 conference to March 13, 2025, will allow defense counsel to complete their trials and begin to review
8 and analyze the recently produced discovery. The defense counsel need to review this discovery in
9 order to have an informed and meaningful status conference and to propose a schedule for motions the
10 defense intends to file prior to trial.

11 As such, the parties request and jointly stipulate that the February 6, 2025 status conference be
12 continued to March 13, 2025, or as soon thereafter may be heard.

13 The parties agree that it is appropriate to exclude time under the Speedy Trial Act for effective
14 preparation of counsel and for the continuity of counsel. The parties also request and stipulate that time
15 should be excluded from February 6, 2025, through March 13, 2025, under the Speedy Trial Act, for
16 effective preparation of counsel and for the continuity of counsel (18 U.S.C. § 3161(h)(7)(B)(ii) and
17 (iv)). The parties also agree that the ends of justice served by granting an exclusion of time to March 13,
18 2025 outweigh the best interests of the public and the defendants in a speedy trial. *See* 18 U.S.C.
19 § 3161(h)(7)(A).

20 IT IS SO STIPULATED.

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1 DATED: January 31, 2025

2 ISMAIL RAMSEY
3 United States Attorney

4 _____/S/_____
5 LLOYD FARNHAM
6 ALETHEA SARGENT
7 Assistant United States Attorneys

8 _____/S/_____
9 DANIEL BLANK
10 Assistant Federal Public Defender
11 Counsel for SANTOS MOISES SOTO, III

12 _____/S/_____
13 EDWIN PRATHER
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15 Counsel for SANTOS RENE SOTO
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[PROPOSED] ORDER

Based upon the facts set forth in the stipulation, and for good cause shown, the Court continues the status conference set for February 6, 2025 to March 13, 2025.

For good cause, the Court also excludes from the Speedy Trial Act time from February 6, 2025 through March 13, 2025, and finds that failing to exclude the time would unreasonably deny defense counsel and the defendants the reasonable time necessary for effective preparation, taking into account the exercise of due diligence. *See* 18 U.S.C. §§ 3161(h)(7)(A), (B)(iv). The Court further finds that the ends of justice served by excluding this time from computation under the Speedy Trial Act outweigh the best interests of the public and the defendant in a speedy trial.

Therefore, and with the consent of the parties, IT IS HEREBY ORDERED that the time from February 6, 2025 through March 13, 2025 shall be excluded from computation under the Speedy Trial Act.

IT IS SO ORDERED.

DATED:

HONORABLE WILLIAM H. ORRICK
UNITED STATES DISTRICT JUDGE